

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION**

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In re: Lorraine Santoli,

Debtor(s).

Case No. 16-23516-RDD
Chapter 13

Judge: Robert D. Drain

Hearing: February 8, 2017 at 9:55
a.m.

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OBJECTION TO PLAN CONFIRMATION

Toyota Motor Credit Corporation, as servicing agent for Toyota Lease Trust ("Secured Creditor"), by its counsel, Buckley Madole, P.C., states the following grounds as and for an Objection to Confirmation of the debtor's Chapter 13 Plan:

1. Secured Creditor holds the interest in the personal property commonly known as 2016 LEXUS NX200T, VIN: JTJBARBZ6G2062200 (the "Property").

2. Debtor, Lorraine Santoli, entered into a lease agreement on February 18, 2016 agreeing to pay \$450.29 per month for each of thirty-six (36) months commencing on February 18, 2016 in exchange for use and control of the Property. This lease has not yet expired and Secured Creditor has filed Claim #3-1 representing its interests.

3. Debtor's proposed chapter 13 plan at Category 3 fails to acknowledge Secured Creditor. Rather, this section of debtor's proposed plan is blank indicating debtor has not unexpired or executory leases. Secured Creditor objects to this proposed plan as it is silent regarding the treatment of debtor's unexpired lease with Secured Creditor.

4. Absent of modification of debtor's proposed plan clarifying treatment of Secured Creditor's lease, the plan cannot be confirmed.

WHEREFORE, Secured Creditor respectfully requests that the Court deny confirmation of the Debtor's Chapter 13 Plan for the reasons set forth above and for other relief as the Court may

deem just and proper.

Dated: December 29, 2016

Buckley Madole, P.C.
Attorneys for Toyota Motor Credit Corporation as
servicing agent for Lease Trust,

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